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**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA and  
 the STATE OF CALIFORNIA *ex rel.*,  
 SHELBY EIDSON,

*Plaintiffs,*

vs.

AURORA LAS ENCINAS LLC,  
 LINDA PARKS, SIGNATURE  
 HEALTHCARE SERVICES LLC, AND  
 DOES 1 THROUGH 10, jointly and  
 severally,

*Defendants.*

) Case No.: CV 10-1031 JAK (RZx)

) **JOINT WITNESS LIST**

) **Final Pre-Trial Conference: April 7, 2014**

) Time: 1:30 p.m.  
 ) Location: Roybal Federal Bldg.  
 ) 255 E. Temple St.,  
 ) Rm 750  
 ) Judge: Hon. John A. Kronstadt

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LLC and AURORA LAS ENCINAS, LLC

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Pursuant to Local Rule 16-5 and the Court's Orders, the parties hereby submit their Joint Witness List, including estimated time for examination.

**Case Title:** *U.S., ex rel, Eidson v. Aurora Las Encinas, LLC, et al*  
**Case No.:** CV 10-1031 JAK (RZx)

**\*\* Defendants object to the testimony of this witness for the reasons set forth in Defendants' Second Supplemental Brief in Support of Motion in Limine #2 to Exclude Witnesses (to be filed)**

**++ Plaintiff refutes and responds to Defendants' above objections as set forth in Plaintiff's separate motion in limine responsive hereto.**

<u><b>Plaintiff's Witnesses</b></u>	
<u><b>Name</b></u>	<u><b>Brief Summary of Testimony</b></u>
Shelby Eidson	Issues relating to Plaintiff's retaliation claim and Defendants' counter-claims.
<b>** Lisa Ramirez ++</b>	Issues relating to Plaintiff's retaliation claim and Defendants' counter-claims including Ms. Eidson's employment and work ethic.
<b>** Janine Moody ++</b>	Issues relating to Ms. Eidson's employment and work ethic and dangerous conditions at Hospital.
<b>** Aviance Contreras ++</b>	Issues relating to complaints/reports to expose wrongdoing by Defendants; Ms. Eidson's employment and work ethic.
<i>Mark Cline</i>	Issues relating to Plaintiff's retaliation claim.
<i>Kimberly Cabrera</i>	Issues relating to Plaintiff's retaliation claim.
<b>** Belle Lagerstrom</b>	Issues relating to Plaintiff's retaliation claim.
<b>** Arline Clyburn ++</b>	Details regarding Plaintiff's reports regarding witness' son
<b>** Larry Grassini ++</b>	Details regarding Plaintiff's reports regarding witness' son; Plaintiff's motives in regards to her reporting

1		activities; disciplinary action against Dr. Joseph Haraszti
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3	Dr. Soon K. Kim	Retaliatory practices and policies utilized by Signature Healthcare and its subsidiaries, including Aurora Las Encinas; Net worth of Signature and Aurora Las Encinas; Cross-complaint against Plaintiff
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7	Linda Parks	Issues relating to her role as CEO; issues related to complaints submitted by Plaintiff; efforts made by Ms. Parks to discourage reporting by employees
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9		
10	Cheryl Cook	Issues relating to Plaintiff's employment and retaliation claim.
11		
12	** Dr. Daryoush Jamal, M.D.	Details regarding the nature and extent of Plaintiff's emotional distress.
13		
14	** Dr. Ashley Robertson, PsyD	Details regarding the nature and extent of Plaintiff's emotional distress.
15		
16	** Dr. Joseph Haraszti	Plaintiff's motives in regards to her reporting activities and dangerous conditions at Hospital.
17		
18	CMS Designee/ Records Custodian	Foundation for records/documents received , maintained and published/distributed by government agency, and underlying actions and investigations.
19		
20		
21	DMH Designee/ Records Custodian	Foundation for records/documents received , maintained and published/distributed by government agency, and underlying actions and investigations.
22		
23		
24	Medi-Cal Designee/ Records Custodian	Foundation for records/documents received , maintained and published/distributed by government agency, and underlying actions and investigations.
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28		

1	<b><u>Defendants' Witnesses</u></b>																		
2	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th data-bbox="250 317 672 380" style="text-align: center;"><b><u>Name</u></b></th><th data-bbox="672 317 1565 380" style="text-align: center;"><b><u>Brief Summary of Testimony</u></b></th></tr> </thead> <tbody> <tr> <td data-bbox="250 380 672 443">3 Cheryl Cook</td><td data-bbox="672 380 1565 443">Issues relating to Plaintiff's employment and scheduling.</td></tr> <tr> <td data-bbox="250 443 672 831">4 Jerry Conway 5 6 7 8 9 10</td><td data-bbox="672 443 1565 831">Policies of the hospital regarding confidentiality of patient information. Types of documents removed by Plaintiff from the hospital. Information contained within the documents removed. Organizational structure of the entities. Reasons for Plaintiff's termination. Damages to Aurora Las Encinas and Signature Healthcare Services as a result of Plaintiff's conduct.</td></tr> <tr> <td data-bbox="250 831 672 1083">11 Tim Sides 12 13 14</td><td data-bbox="672 831 1565 1083">Damages to Aurora Las Encinas and Signature Healthcare Services as a result of Plaintiff's conduct. Comparison of staffing ratios at Defendant Hospital compared with other similar facilities in the area.</td></tr> <tr> <td data-bbox="250 1083 672 1272">15 P. Blair Stam 16 17</td><td data-bbox="672 1083 1565 1272">Organizational structure of the entities. Losses incurred by Aurora Las Encinas and Signature Healthcare Services.</td></tr> <tr> <td data-bbox="250 1272 672 1472">18 Soon K. Kim, M.D. * 19 20</td><td data-bbox="672 1272 1565 1472">Organizational structure of entities. Damages caused to Aurora Las Encinas and Signature Healthcare Services as a result of Plaintiff's conduct.</td></tr> <tr> <td data-bbox="250 1472 672 1535">21 Marge Chick *</td><td data-bbox="672 1472 1565 1535">Issues relating to patient care and compliance matters.</td></tr> <tr> <td data-bbox="250 1535 672 1734">22 Margaret Andricos * 23 24</td><td data-bbox="672 1535 1565 1734">Issues regarding patient care, specifically relating to interpreter services, group therapy and discharge planning.</td></tr> <tr> <td data-bbox="250 1734 672 1820">25 Carol Peart * 26</td><td data-bbox="672 1734 1565 1820">Organizational structure of the entities.</td></tr> </tbody> </table>	<b><u>Name</u></b>	<b><u>Brief Summary of Testimony</u></b>	3 Cheryl Cook	Issues relating to Plaintiff's employment and scheduling.	4 Jerry Conway 5 6 7 8 9 10	Policies of the hospital regarding confidentiality of patient information. Types of documents removed by Plaintiff from the hospital. Information contained within the documents removed. Organizational structure of the entities. Reasons for Plaintiff's termination. Damages to Aurora Las Encinas and Signature Healthcare Services as a result of Plaintiff's conduct.	11 Tim Sides 12 13 14	Damages to Aurora Las Encinas and Signature Healthcare Services as a result of Plaintiff's conduct. Comparison of staffing ratios at Defendant Hospital compared with other similar facilities in the area.	15 P. Blair Stam 16 17	Organizational structure of the entities. Losses incurred by Aurora Las Encinas and Signature Healthcare Services.	18 Soon K. Kim, M.D. * 19 20	Organizational structure of entities. Damages caused to Aurora Las Encinas and Signature Healthcare Services as a result of Plaintiff's conduct.	21 Marge Chick *	Issues relating to patient care and compliance matters.	22 Margaret Andricos * 23 24	Issues regarding patient care, specifically relating to interpreter services, group therapy and discharge planning.	25 Carol Peart * 26	Organizational structure of the entities.
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27

28 \* May call as a witness.

<b><u>Plaintiff's Witnesses (in the order in which they are proposed to be called)</u></b>				
<b><u>Name</u></b>	<b><u>Direct</u></b>	<b><u>Cross</u></b>	<b><u>Re-Direct</u></b>	<b><u>Total</u></b>
Larry Grassini	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
Shelby Eidson	<b>4</b>	<b>3</b>	<b>.5</b>	<b>7.5</b>
<i>Lisa Ramirez</i>	<b>1.5</b>	<b>1</b>	<b>.5</b>	<b>3</b>
<i>Janine Moody</i>	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
<i>Aviance Contreras</i>	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
<i>Mark Cline</i>	<b>2</b>	<b>1</b>	<b>.5</b>	<b>3.5</b>
<i>Kimberly Cabrera</i>	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
<i>Belle Lagerstrom</i>	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
Arline Clyburn	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
Dr. Soon K. Kim	<b>2</b>	<b>1</b>	<b>.5</b>	<b>3.5</b>
Linda Parks	<b>2</b>	<b>1</b>	<b>.5</b>	<b>3.5</b>
Cheryl Cook	<b>2.5</b>	<b>1.5</b>	<b>.5</b>	<b>4.5</b>
Dr. Ashley Robertson	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
Dr. Daryoush Jamal	<b>1</b>	<b>.5</b>	<b>.5</b>	<b>2</b>
Dr. Joseph Haraszti	<b>2</b>	<b>1</b>	<b>1</b>	<b>4</b>
CMS Designee/ Records Custodian	<b>1</b>	<b>.5</b>	<b>.25</b>	<b>1.75</b>
DMH Designee/ Records Custodian	<b>1</b>	<b>.5</b>	<b>.25</b>	<b>1.75</b>
Medi-Cal Designee/ Records Custodian	<b>1</b>	<b>.5</b>	<b>.25</b>	<b>1.75</b>
<b>TOTAL</b>	<b>27</b>	<b>15</b>	<b>8.75</b>	<b>50.75</b>

**Defendants' Witnesses (in the order in which they are proposed to be called)**

<b><u>Name</u></b>	<b><u>Direct</u></b>	<b><u>Cross</u></b>	<b><u>Re-Direct</u></b>	<b><u>Total</u></b>
Cheryl Cook	2	1.5	1	4.5
Jerry Conway	2	1.5	1	4.5
Tim Sides	1	.5	.5	2
P. Blair Stam	2	.5	.5	3
Soon K. Kim, M.D. *	1	1	.5	2.5
Marge Chick *	1	1	.5	2.5
Margaret Andricos *	1	.5	.5	2
Carol Peart *	1	1	.5	2.5
<b>Total</b>	<b>11</b>	<b>7.5</b>	<b>5</b>	<b>23.5</b>

**Alphabetical Listing of All Witnesses**

**(for those witnesses each party intends to call,  
the totals shown below are combined)**

<b><u>Name</u></b>	<b><u>Direct</u></b>	<b><u>Cross</u></b>	<b><u>Re-Direct</u></b>	<b><u>Total</u></b>
Margaret Andricos	1	.5	.5	2
Kimberly Cabrera	1	.5	.5	2
Marge Chick	1	1	.5	2.5
Mark Cline	2	1	.5	3.5
Arline Clyburn	1	.5	.5	2
Aviance Contreras	1	.5	.5	2
Jerry Conway	2	1.5	1	4.5
Cheryl Cook	4.5	3	.5	8
Shelby Eidson	4	3	.5	7.5

1	Larry Grassini	1	.5	.5	2
2	Dr. Joseph Haraszti	2	1	1	4
3	Dr. Daryoush Jamal	1	.5	.5	2
4	M.D.				
5	Soon K. Kim, M.D.	3	2	.5	5.5
6	Belle Lagerstrom	1	.5	.5	2
7	Janine Moody	1	.5	.5	2
8	Linda Parks	2	1	.5	3.5
9	Carol Peart	1	1	.5	2.5
10	Lisa Ramirez	1.5	1	.5	3
11	Ashley Robertson	1	.5	.5	2
12	PsyD				
13	Tim Sides	1	.5	.5	2
14	P. Blair Stam	2	.5	.5	3
15	CMS Designee/ Records Custodian	<b>1</b>	<b>.5</b>	<b>.25</b>	<b>1.75</b>
16	DMH Designee/ Records Custodian	<b>1</b>	<b>.5</b>	<b>.25</b>	<b>1.75</b>
17	Medi-Cal Designee/ Records Custodian	<b>1</b>	<b>.5</b>	<b>.25</b>	<b>1.75</b>
18					
19	<b>Total</b>	<b>38</b>	<b>22.5</b>	<b>12.25</b>	<b>72.75</b>
20					

Based on the above, Plaintiff estimates a maximum of 24 hours total to present her case in chief. Plaintiff also reserves the right to call any witness on Defendants' witness list that the Defendant does not call in her case in chief. Plaintiff also reserves their right to call any additional witnesses as necessary for impeachment or rebuttal purposes as allowed by the Local Rules of Court.



Based on the above, Defendants estimate that they will need approximately 11 hours to present their case. Defendants reserve the right to call any witness that the Plaintiff does not call in her case in chief. Defendant also reserves their right to call any additional witnesses as necessary for impeachment or rebuttal purposes as allowed by the Local Rules of Court.

DATED: March 31, 2014

Respectfully Submitted,

COLLEEN FLYNN  
MARK A. KLEIMAN  
DISABILITY RIGHTS LEGAL CENTER

By: \_\_\_\_\_

RICHARD DIAZ  
Attorney for Plaintiff

DATED: March 31, 2014

By: \_\_\_\_\_

MICHAEL L. COHEN  
COHEN McKEON LLP  
Attorneys for Defendants  
SIGNATURE HEALTHCARE SERVICES,  
LLC and AURORA LAS ENCINAS, LLC

4825-5735-4521, v. 3